

**EXHIBIT F**  
**PSYCHOLOGISTS' LETTERS**

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June 7, 2023

Mark J. Werksman  
Werksman Jackson & Quinn LLP.  
888 W 6th Street, 4<sup>th</sup> Floor  
Los Angeles, CA 90017

RE: Goulin, Gary  
DOB: 02/02/1961

Dear Mr. Werksman:

This letter is written on behalf of Dr. Gary Goulin, a 62-year-old White, and Non-Hispanic male, who was referred to this writer for a psychological assessment of self-reported symptoms of substance abuse. On November 4, 2021, Dr. Goulin was arrested by Los Angeles Police Department officers and charged with Possession of Child Pornography. In November 2022, the United States Attorney's Office of the Central District of California appropriated the jurisdiction of his criminal case from the State of California. On April 26, 2023, he signed a plea agreement to plead guilty to one count of Possession of Child Pornography. He is scheduled to be sentenced on October 13, 2023.

SOURCES OF INFORMATION:

Clinical Interview with Dr. Goulin (3/27/2023 and 4/11/2023)  
Mental Health and Substance Use Intake Form  
Substance Abuse Timeline  
Beck Depression Inventory-II  
Beck Anxiety Inventory  
The Alcohol Use Disorders Identification Test (AUDIT): Self-Report Version  
The Cannabis Use Disorder Identification Test-Revised (CUDIT- R)  
Michigan Alcohol Screening Test (MAST)  
Drug Abuse Screening Test (DAST - 28)  
PTSD Checklist for DSM-5 (PCL-5)  
Adverse Childhood Experiences (ACE)  
Proposed Plea Agreement, United States District Court for the Central District of California

FAMILY HISTORY

Dr. Goulin was born in Minneapolis, Minnesota, and raised in Saint Louis Park, Minnesota, a suburb of Minneapolis. He lived in an intact family with his two younger sisters, until his parents divorced when he was 14 years old. His mother is still alive and his father passed away in 2013. According to Dr. Goulin, "I grew up in a middle-class suburb in a safe neighborhood full of children my age. It was a close-knit neighborhood and many of the children are friends to this day. My family wasn't wealthy, but we had all the things that we needed. My parents divorced when I was 14. My mother had full custody but my father lived nearby and came to

visit frequently. I had a small group of very close friends who remain close to this day. In general, I had a fairly happy childhood, though I began to realize later that I was “different.”

He denied a family history of substance use. He reported that his oldest sister and a paternal aunt had “nervous breakdowns,” his youngest sister has a gambling addiction and his mother had a “moderate to severe obsessive-compulsive disorder.”

Dr. Goulin and his partner have been a couple since 1994, married for 6 years and live in Los Angeles, California. They do not have children.

#### ACADEMIC AND OCCUPATIONAL HISTORY

Dr. Goulin graduated from Saint Louis Park High School in 1979. He obtained a Bachelor’s degree in Behavioral Biology from Johns Hopkins University on May 27, 1983. In 1987, Dr. Goulin graduated from the Mayo Medical School with a Doctor of Medicine degree. He completed his Residency in Pediatrics at Children’s Hospital, Los Angeles in 1990. In addition, in 1993 he completed his Fellowship in Pediatric Critical Care Medicine at the Children's Hospital, and Health Center of San Diego.

Dr. Goulin had been employed as a medical doctor for 28 years. He had been in his last position, Associate Director of Pediatric Critical Care at Cedars-Sinai Medical Center in Los Angeles California since 2006 before having to be forced to resign after his initial arrest for the State of California offense in November 2021. He is currently unemployed.

#### MILITARY HISTORY

Dr. Goulin has never served in any branch of the United States armed forces.

#### CRIMINAL HISTORY

On November 4, 2021, Dr. Goulin was arrested by Los Angeles Police Department and Inter-Agency Council on Child Abuse and Neglect (ICAN) officers after they came to his house and found child pornography in his bedroom. In November 2022, he was in the final negotiations with the Los Angeles County District Attorney for a plea deal on state charges, which included probation with no jail time, when federal prosecutors unexpectedly took over the case. Dr. Goulin was arrested and charged with Possession of Child Pornography, a federal felony, while the State of California dropped their charges.

Dr. Goulin disclosed that he had one prior arrest in 1995 for Lewd Conduct but the misdemeanor charge was dismissed

#### MEDICAL HISTORY

Dr. Goulin has a variety of medical issues at this time. He is being treated with a regimen of medication for these ailments.

#### MENTAL HEALTH AND SUBSTANCE ABUSE HISTORY

Dr. Goulin reported that he has been diagnosed with generalized anxiety disorder, depression, and obsessive-compulsive disorder since 1994. He informed that his primary care physician, Philip Musikanth, MD, prescribed medication for him from 1996 until November 2020. During



this time Dr. Goulin indicated that he was prescribed Luvox, which was transitioned to Wellbutrin, both of which “appeared to have worked for quite some time.” In addition, he met with a psychologist, Dr. R. Guy Lewis, weekly for several years between 1995 and 2000. He then saw other therapists, off and on, for stress and anxiety for a total of about 12 years. Also, he was in couples counseling from 2016 to 2021. He restarted treatment with Dr. Lewis after his arrest in November of 2021 and continues to see him regularly weekly. Dr. Goulin stated that Dr. Lewis is helping him deal with “the trauma of my arrest, my Obsessive Compulsive Disorder, depression, my porn addiction/sexual compulsion, and he has been trying to help manage my severe and debilitating anxiety. In addition, he has been meeting with a psychiatrist, Kalyan Rao, MD, who has been adjusting his medications in an attempt to regulate his psychological symptoms of anxiety, depression and obsessive-compulsive behaviors. He is currently prescribed Clonazepam, Wellbutrin and Gabapentin.

Dr. Goulin reported that his anxiety and depression escalated in 2018 when he believed he was targeted with a pay deduction by his employer largely because of his age and the difficulty for him to find another job at his pay level. He acknowledged that this “created a lot of tension and stress” at work and in his personal life. Dr. Goulin stated that “Unfortunately, I didn’t recognize that, and that’s when I began to use pornography rather than psychotherapy or meds to numb my feelings. This is when I also began to use Ambien to help with insomnia and nighttime ruminations. The pornography addiction got worse and worse and ultimately led to my arrest.” After his initial arrest he was placed on Clonazepam which according to Dr. Goulin “helped and my stress abated somewhat but I was still having waves of severe anxiety and depression. However, when the case went from State to Federal court, my anxiety and depression deepened. We have spent the last 4 to 6 months trying (still unsuccessfully) to get my anxiety and depression under control. Various medications have been attempted including Vistaril, Guanfacine, and short-acting Wellbutrin, but currently, the only drug that seems to have any effect in managing my anxiety has been Clonazepam and the effect is short-lived. I have yet to find a medication regimen that has allowed me to withdraw successfully off the Clonazepam. I continue to take Gabapentin and Wellbutrin as prescribed but they do not help in the short term with episodic anxiety. The depression, loneliness, and fear persist.”

Dr. Goulin has been on psychotropic medication for anxiety since 1994 and has never attempted to take himself off of this medicine. He reported that there have been times when his psychiatrist has tried to wean some of the medications and “the result is almost always met with more severe anxiety, agitation, fear, and/or depression. When I was weaned off those medications, my anxiety escalated even more. My withdrawal symptoms include anxiety attacks, a racing heartbeat, waves of depression and loneliness, and the fear that I will lose my sobriety. My husband says I am unfocused, forgetful, and ornery when I am not medicated, and I isolate. I have been unable to stop taking Clonazepam. When I try to delay taking a Clonazepam for anxiety and instead try exercise or meditation, I find that generally, my anxiety continues to worsen, and I develop anxiety attacks rather than get better.” He finds himself taking increasing amounts of Clonazepam to achieve the desired effect or to cope. For example, he stated “I’m finding that 0.5 mg of Clonazepam is becoming less and less effective in curbing my anxiety. I am generally requiring 1 mg to achieve any benefit. Since my arrest, I have struggled to achieve a physiological balance with the prescription medication. I have suffered heavily in terms of my anxiety, depression, fear, and loneliness. My psychiatrist has been unable to figure out a



prescription regimen to help me reclaim my balance thus far. Without the medication, I am unable to function without debilitating fear, depression, and anxiety." This has made Dr. Goulin dependent and addicted to psychotropic medication.

Dr. Goulin denied a history of alcohol, cannabis or illegal drug use.

Dr. Goulin reported that from November 2021 until January 2023 he attended and completed a Sexually Offending Behavior Recovery (SOBR) Program approved by both L.A. County Probation and the California Sexual Offender Management Board. He has also attended and become very active in Sexual Compulsives Anonymous since November 10, 2021, and has a sponsor. He has attended over 425 SCA meetings and has held multiple service positions.

#### MENTAL STATUS

Dr. Goulin was cooperative and sober for the intake sessions. He appeared his age and was oriented to person, place, and time. His speech was of normal tone, pitch, and pace. He was alert, responsive to the setting, and oriented to person, place, and time. His emotional expression was related to content. His mood was normal and his affect was flat. He denied current homicidal or suicidal ideation. His thought processes appear normal and appropriate in content. He can express both concrete and abstract thinking. His insight and judgment are within normal limits. There was no evidence of hallucinations or delusions. This was a normal mental status examination and he appears to be a reliable source of information.

Dr. Goulin reported experiencing symptoms of tension; nervousness; tearfulness; depression including vegetative signs of eating and sleeping problems; feeling helpless, feeling hopeless; agitation; anger; difficulty concentrating; memory problems; difficulty concentrating; racing thoughts; relationship problems; fear of abandonment and rapid heartbeats all within the last 30 days. He attributed this largely to the stress around his current legal problems.

#### PSYCHOLOGICAL TESTING AND SUBSTANCE ABUSE SCREENING

Dr. Goulin's substance use and overall mental health status were evaluated. Dr. Goulin was administered the Drug Abuse Screening Test (DAST - 28), to assess his drug use with other drugs besides alcohol and marijuana, including the use of (1) prescribed medication or "over the counter" drugs above directions and (2) any non-medical use of illegal drugs during the past year. On this test, he endorsed 13 out of 28 items, which pointed to his excessive misuse of prescribed anti-anxiety medication. As noted earlier, he is prone to take these medications above and beyond their prescribed levels daily.

He was assessed not to have an alcohol disorder. For example, his scores on the Alcohol Use Disorders Identification Test (AUDIT) and Michigan Alcohol Screening Test (MAST) did not indicate an alcohol abuse history.

Similarly, his score on the Cannabis Use Disorder Identification Test-Revised (CUDIT - R) did not indicate that he has a cannabis use disorder at this time.

Psychological testing was administered to objectively assess Dr. Goulin's depression and anxiety. He scored in the "Severe" range on the depression instrument and the "Moderate" range on the anxiety measure. He endorsed several items that indicate that his current emotional state is related to his current legal problems and his struggle with addiction.

Psychological testing was administered to assess the presence and strength of Post-traumatic Stress Disorder symptoms he has experienced in the last month. Dr. Goulin scored 60 out of a possible 80 points on the PTSD Checklist for DSM-5 (PCL-5). A cutoff score of 33 appears to be a reasonable value to propose the presence of post-traumatic stress, suggesting Dr. Goulin's current legal problems has significantly harmed his emotional state.

Adverse Childhood Experiences (ACEs) are traumatic events involving abuse, neglect, and household dysfunction that occurs during childhood (before age 18). On the ACE, people can have a score of 0 to 10, depending on how many adverse childhood experiences have occurred. Dr. Goulin's ACE score was 3, which was largely attributed to a family history of mental illness, e.g., mother, aunts, and sisters, and an early sexual trauma experience.

#### DIAGNOSTIC FORMULATION

Dr. Goulin has Anxiolytic Use Disorder, which is supported by his self-reported history and his scores on measures of substance use, which occurred before his instant offense. He continues to evidence a problem with the misuse of anxiolytics, i.e., Clonazepam, at present. The progressive and excessive use of anxiolytics has led to an adverse impact on his judgment and on his ability to make sound decisions, which ultimately negatively affected many areas of his life. In addition, Dr. Goulin appears to have evidence of anxiety and depression fueled by his current legal problems.

#### DIAGNOSIS

*Anxiolytic Use Disorder, Severe*

*Generalized Anxiety Disorder (Self-Reported)*

*Persistent Depressive Disorder (Self-Reported)*

*Obsessive Compulsive Disorder (Self-Reported)*

#### TREATMENT RECOMMENDATIONS

Dr. Goulin's level of insight toward the presenting problems was assessed. He was noted to demonstrate good insight into the problematic nature of his behavior and symptoms and acknowledges that his dependence and addiction to Clonazepam had on his life, especially in his interpersonal and legal affairs. Dr. Goulin is highly motivated to stop his addiction to anxiolytic use and participate in treatment. When asked about the benefit of receiving treatment for his anxiolytic disorder, he replied, "I hope desperately that treatment will help me find my footing. I need treatment to help me learn to live without having to fear dependence or addiction. My goal is to live without any dependence on medication. With appropriate care, I hope to effectively learn to manage my stress and anxiety. Currently, I am unable to recognize stress and the remedies I can put into place to alleviate it. By being able to manage my stress and anxiety, I will never, ever have to turn to porn or other maladaptive behaviors and never end up in legal jeopardy again."

The following are recommended to assist him in his efforts to treat his substance use disorder and prevent relapse:

1. Continue to attend individual psychotherapy sessions to address his anxiety, depression, obsessive-compulsive behavior, and excessive use of Clonazepam;



Psychological Evaluation

Goulin, Gary

2. Continue to meet regularly with his psychiatrist for medication management and compliance;
3. Continue to regularly attend in-person SCA meetings and;
4. There is no doubt that he could benefit from an intensive drug treatment program, such as a Residential Drug Abuse Program (RDAP) during his incarceration in a Federal Bureau of Prison facility. If he is sentenced to a prison term, hopefully, he will be able to commence this program near the beginning of his sentence so that he can take full advantage of the curriculum to help him adjust to prison and prepare him to re-enter society as a sober person.

Please feel free to contact me if you have any further questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Gerard W. Bryant", enclosed within a rectangular box.

Gerard W. Bryant, Ph.D.  
Licensed Psychologist  
NYS#010164

Dr. Guy Lewis  
8170 Beverly Blvd., Ste 108  
Los Angeles, CA 90048  
323.655.3489

Aug 01, 2023  
RE: Gary Goulin

My name is Dr Guy Lewis; I am licensed as a Dr of Clinical Psychology. I also have a Doctorate in Behavioral Medicine. I received my Masters Degree in Clinical Psychology from Antioch University. I received degrees in both Doctorates in Clinical Psychology and Behavioral Medicine from California Graduate Institute (CGI)

I have been in practice since 1993 and am governed by the California Board of Psychology. I sit on various boards and belong to psychological/psychiatric associations as I continue research in the field of the abuse of many substance and the psychosocial effects that it has on the individual and society

I write this letter with the signed consent of Mr. Goulin for disclosure of and my professional opinion as to his state of mind and his psychological needs to address the issues of his substance use challenges.

I have been seeing Mr. Goulin since 1995, it was only revealed to me of his lapse in judgment that evolved into his current situation. Mr. Goulin has been involved in a 12 step program for compulsive sexual addicts, attending regular individual psychotherapy sessions and group sessions and volunteering at various non-profit facilities since his arrest.

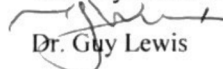
My main concern is that Mr. Goulin has built an addiction to anti-anxiety agents such as Clonazepam and Gabapentin with other agents to help control his anxiety. Mr. Goulin started his dependency on anxiolytics between 2018 and early 2021.

The withdrawal symptoms from the unsafe use of these agents will occur when Mr. Goulin stops taking the drugs. It is well documented that withdrawal can be extremely uncomfortable and challenging without the aid of a therapeutic regime. Common symptoms of withdrawal include tremors, insomnia, agitation, anxiety, lack of coordination and restlessness.

Withdrawing from any substance use can also lead to rebound symptoms of insomnia or anxiety symptoms that the medication is being taken to treat in the first place. These withdrawals can occur days to weeks after cessation. The reappearance of a mood or anxiety disorder may also occur during withdrawal and may not subside over time...

Current scientific research shows that psychological treatment of those with Substance Use Disorders in the criminal justice system can change the person's attitudes, beliefs, and behaviors toward drug use; avoid relapse; and successfully remove them from a life of substance use. For these reasons I highly recommend that Mr. Goulin be allowed to participate in any available program to address his addictive substance use...

Should you have any questions, please do not hesitate to contact me.

  
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